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8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA
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11 UNITED STATES OF AMERICA,)
12 Plaintiff,) CASE NO.: 2:13-CR-00039-JAD-VCF
13 vs.)
14 RAMON DESAGE,)
15 Defendant.)
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18 **STIPULATION TO CONTINUE**
BRIEFING SCHEDULE ON TAX LOSS
19 **(Second Request)**

20 IT IS HEREBY STIPULATED AND AGREED, between, Defendant Ramon Desage, by and
21 through his counsel, Richard A. Wright, Esquire, and George Kelesis, Esquire, and Plaintiff, United
22 States of America, represented by Nicholas Trutanich, United States Attorney, and Patrick Burns,
23 Assistant United States Attorney, that the schedule for the parties' briefing on tax loss, be reset so
24 that Defendant Desage's response brief is due April 26, 2019, and the government's reply is due
25 on May 10, 2019.

26 This Stipulation is entered into for the following reasons:

27 1. On February 12, 2019, the Court set a briefing schedule on tax loss to be used in
28 sentencing Defendant Desage. The government's opening brief regarding tax loss was due and filed

1 on March 29, 2019; Desage's responsive brief is currently due on April 12, 2019, and the
2 government's reply brief is currently due on April 19, 2019.

3 2. The two week extension of time for filing the Desage Response is necessitated by
4 unanticipated medical issues by counsel for Mr. Desage which prevent counsel from meeting the
5 current schedule.

6 3. In order to provide the Court a meaningful brief that helpfully reconciles the disparate
7 views of the parties and their experts, a continuation of the briefing schedule appears necessary.

8 4. The parties are conscious of the Court's admonition against enlargement of the
9 briefing schedule and the need to bring this litigation to a conclusion. This request for a continuation
10 of the briefing is made for good cause, without an intention to unnecessarily delay the proceedings,
11 and with the intention to provide the Court the most meaningful briefing on the tax loss issue.

12 Dated this 10th day of April, 2019.

13 NICHOLAS A. TRUTANICH
14 UNITED STATES ATTORNEY

15 BY /s/ Richard A. Wright
16 RICHARD A. WRIGHT, ESQUIRE
GEORGE KELESIS, ESQUIRE

BY /s/ Patrick Burns
PATRICK BURNS
Assistant U.S. Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA
3

4 UNITED STATES OF AMERICA,)
5 Plaintiff,)
6 vs.)
7 RAMON DESAGE,)
8 Defendant.)
9

CASE NO.: 2:13-CR-00039-JAD-VCF

FINDING OF FACT AND ORDER

10 Based on the Stipulation of counsel, and good cause appearing therefore, the Court finds that:

11 1. On February 12, 2019, the Court set a briefing schedule on tax loss to be used in
12 sentencing Defendant Desage. The government's opening brief regarding tax loss was due and filed
13 on March 29, 2019; Desage's responsive brief is currently due on April 12, 2019, and the
14 government's reply brief is currently due on April 19, 2019.

15 2. The two week extension of time for filing the Desage Response is necessitated by
16 unanticipated medical issues by counsel for Mr. Desage which prevent counsel from meeting the
17 current schedule.

18 3. In order to provide the Court a meaningful brief that helpfully reconciles the disparate
19 views of the parties and their experts, a continuation of the briefing schedule appears necessary.

20 4. The parties are conscious of the Court's admonition against enlargement of the
21 briefing schedule and the need to bring this litigation to a conclusion. This request for a continuation
22 of the briefing is made for good cause, without an intention to unnecessarily delay the proceedings,
23 and with the intention to provide the Court the most meaningful briefing on the tax loss issue.

24 For all of the above-stated reasons, the ends of justice would be served best by a continuance
25 of the briefing schedule.

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1 **ORDER**

2 IT IS ORDERED that the deadline for Defendant Desage to file his response brief on the tax
3 loss issue in United States v. Ramon Desage, Case No. 2:13-CR-039-JAD-VCF, is reset to
4 April 26, 2019. And the deadline for the government's reply brief is
5 reset to May 10, 2019. **No further extensions will be granted.**

6 Dated this 12th day of April, 2019.

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9 JENNIFER A. DORSEY
United States District Judge